Bondy teaches a display subsystem architecture that binds independent drivers together for controlling a single display device. Bondy is targeted at multiple graphics programs which utilize the same computer screen for display. Bondy's programming interface is able to reconfigure itself by dynamically binding the desired graphics package with the required resource management service (RMS) features and device specific model instance drivers for the display adapter being used. Thus, Bondy teaches a single, configurable programming interface for displaying graphics on a single display device.

Bergler teaches a connection between a plurality of different application program modules and a network interface of an ISDN. An application's program interface (API) is connected with a plurality of different application programs. The API is connected to a network connection (ACID) of an integrated services digital network (ISDN). This ACID handles the queuing and messaging necessary in Bergler's system. The ACID is in turn connected to the ISDN network, and the individual ISDN service program modules.

Bondy and Bergler can not be logically combined. Bondy specifies that the programming interface consist of RMS features bound to a display adapter defined by the graphics package being used. Bergler, on the other hand, deals with an ISDN system. Thus, because Bondy teaches a graphics display, while Bergler teaches interaction with ISDN devices, such as telephony and fax and packet data, they can not be logically combined.

Even in combination, the AAPA, Bondy and Bergler do not make the present invention, as claimed, obvious. Claim 1 of the present invention claims "an application has a first plurality of distinct programming

interfaces." The AAPA does not teach a plurality of distinct programming interfaces. <u>Bondy</u> specifically teaches against a plurality of programming interfaces. Rather, <u>Bondy</u> teaches a single programming interface, which is configurable to interact with different graphics packages. <u>Bergler</u> also teaches a single programming interface, which contains service program modules. Additionally, <u>Bergler</u> teaches the single API connected to a single ACID, which in turn is connected to the plurality of ISDN devices. Thus, none of the AAPA, <u>Bondy</u> or <u>Bergler</u> teach the use of a plurality of distinct programming interfaces, as claimed by the present invention.

Claim 1 further claims "a first plurality of distinct programming interfaces available to access a plurality of separate sets of I/O services." <u>Bondy</u> teaches against the use of separate I/O services. <u>Bondy</u> is designed to allow the operation of multiple applications programs on a single I/O device, such as a computer screen. Specifically, <u>Bondy</u> teaches a graphics adapter interface for allowing multiple graphics packages to use share a computer screen. <u>Bergler</u> teaches the programming interfaces all accessing a network interface (ACID) of an integrated services digital network. Thus, the programming interfaces are not available to access separate sets of I/O services. Therefore, Claim 1 of the present invention is not obvious over the AAPA, <u>Bondy</u>, further in view of <u>Bergler</u>.

Claim 2 claims "the plurality of distinct programming interfaces are tailored to a type of I/O service provided by each set of I/O services." As discussed above, AAPA does not teach tailored programming interfaces. <u>Bondy</u> teaches a single interface, which is modified by the application program to interact with it. Additionally, <u>Bondy</u> does not teach a plurality of

I/O services, but rather teaches a single I/O service, namely a computer screen. Bergler does not teach programming interfaces tailored to a type of I/O service. Rather, Bergler teaches modules contained within a single API which direct the coupling of the ACID with the ISDN. Therefore, Claim 2 is not obvious over AAPA, Bondy further in view of Bergler.

Claim 3 claims "each programming interface transfers service requests to one of a plurality of servers, wherein each of the plurality of servers responds to service requests from clients of separate sets of I/O services." The AAPA does not teach programming interfaces. Bondy does not teach a plurality of I/O services, or a plurality of servers. Rather, Bondy teaches a single server and a single computer display shared by multiple graphics applications. Bergler teaches programming interfaces that all interface with a single ACID. Thus, no separate servers are taught by Bergler. Therefore, Claim 3 is not obvious over AAPA, Bondy further in view of Bergler.

Similarly, Claim 9 claims a set of I/O services of different types, which are accessed through one of a plurality of program structures. None of the AAPA, Bondy or Bergler teach I/O services of different types accessed through different program structures. Thus, Claim 9 is not obvious in view of AAPA, Bondy and Bergler.

Accordingly, Applicant respectfully submits that the rejections under 35 U.S.C. §103 have been overcome by the amendments and the remarks and withdrawal of these rejections is respectfully requested. Applicant submits that Claims 1-21 are now in condition for allowance and such action is earnestly solicited.

If there are any additional charges, please charge them to our Deposit Account Number 02-2666. If a telephone conference would facilitate the prosecution of this application, the Examiner is invited to contact Michael J. Mallie at (408) 720-8598.

Respectfully submitted,
BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: _____4/2_____, 1997      _____

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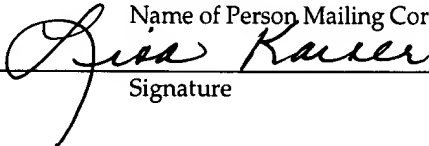
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